

## REMARKS

Applicants respectfully request reconsideration of this application. No claims have been amended. No new claims have been added. Claims 12-13, 18-20 and 30 have been cancelled, without prejudice. Therefore, claims 1-11, 14-17, 21-29 and 31-41 are now presented for examination.

### 35 U.S.C. § 102 Rejection

Claims 1-8, 14-17, 21-29, 31-32 stand rejected under 35 U.S.C. § 102(e), as being anticipated by Epinions.com (“Epinions”).

Epinions discloses allowing consumers “to write about products [they] love or hate . . . [and they] get to *rate the usefulness of anyone’s opinion*” (page 2; emphasis provided). Epinions further discloses “[b]uilding [a] Web of Trust” by “*rat[ing] reviews*” and, as acknowledged by the Examiner, “the particular user’s *rating of other users’ review* and the other *users’ reviews of the particular user’s ratings*” (pages 5 and 9-10; Office Action, mailed Nov. 19, 2003, page 18; emphasis provided).

Epinions further discloses “[i]f you *find opinions of certain members valuable, you may choose to trust them* . . . so you’ll see trusted member opinions first . . . [and if] you specify that you trust a member, you tap into his or her Web of Trust” (page 23). At best, Epinions discloses “a ‘web’ of people of *who trust each other*” by trusting each other’s reviews or opinions (page 24).

Claim 1, in pertinent part, recites “deriving one or more community ratings uniquely corresponding to a particular user by aggregating the one or more characteristic values associated with the particular user and the one or more characteristic values”

associated with each user of the plurality of users sponsored to the online trading community by the particular user” (emphasis provided).

For example, the “rating is derived for a particular user of the electronic community based on a characteristic value associated with the particular user and the characteristic values associated with users related to the particular user” (Specification, page 4; emphasis provided; see also claim 1). For example, if A is the particular user and A has introduced users B and C to the electronic trading community, the community rating includes the aggregation of the characteristic values of A and the characteristic values of B and C, who were sponsored to the trading community by A.

Stated differently, as recited by claim 1, the community rating includes aggregating the characteristic values of the particular user and the characteristic values of the users brought to the online trading community by the particular user. This is not the same as Epinions’ web of people who *trust each other*. Using the above example of users A, B, and C, at best, Epinions discloses a *web of users A, B, and C who trust each other*. Epinions does not teach or reasonably suggest aggregating the one or more characteristic values associated with the particular user and the one or more characteristic values associated with each user of the plurality of users sponsored to the online trading community by the particular user, as recited by claim 1.

Accordingly, for at least the reasons set forth above, Applicants respectfully request the withdrawal of the rejection of claim 1 and its dependent claims.

With regard to claims 14, 22 and 28, the claims contain limitations similar to those of claim 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claims 14, 22 and 28 and their dependent claims.

### **35 U.S.C. § 103 Rejection**

Claims 11 and 33-39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Epinions.

Claims 9-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Epinions in view of Aho et al., Data Structures and Algorithms ("Aho").

With regard to claim 33, the claim contains limitations similar to those of claim 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claim 33 and its dependent claims.

Claims 9-11 depend from independent claim 1 and thus include the limitations of claim 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claims 9-11.

### **Conclusion**

Applicants submit that claims as amended are now in condition for allowance. Accordingly, Applicants respectfully request that the rejections be withdrawn and the application be allowed.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request for an Extension of Time**

Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

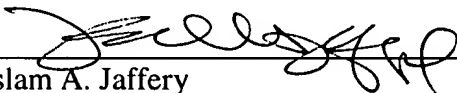
### **Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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